



City of Santa Barbara

Storm Water Management Program

In response to State Water Resources Control Board Water Quality Order 2003-0005-DWQ for National Pollutant Discharge Elimination System (NPDES)
Phase II General Permit No. CAS000004

July 22, 2003

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I. REGULATORY FRAMEWORK

This Draft Storm Water Management Program (SWMP) was prepared by the City of Santa Barbara (City) in response to State Water Resources Control Board Water Quality Order 2003-0005-DWQ for National Pollutant Discharge Elimination System (NPDES) Phase II General Permit No. CAS000004 (State General Permit). This program covers the incorporated area of the City, excluding City facilities with existing NPDES Permits, which include the Airport and Waterfront Departments, El Estero Wastewater Treatment Plant and Cater Water Treatment Plant. Please refer to the map on page 3.

Regulatory Requirements and Applicable Standards

The State General Permit requires the operator of a regulated small municipal separate storm sewer system (MS4) to obtain permit coverage because discharges of storm water from such systems are considered “point sources” of potential pollution. MS4s are considered publicly owned or operated point sources because they collect storm water and direct it into discrete conveyances, including roads with drainage systems and municipal streets.

State General Permit Requirements for Regulated Small MS4s

The owner or operator of a Phase II regulated small MS4, is required to submit a Notice of Intent (NOI) to comply with the terms of the Statewide General Permit, a Storm Water Management Program (SWMP), and a fee to obtain coverage under an NPDES storm water permit. The SWMP needs to describe how the regulated entity will identify and implement a range of “Best Management Practices” that includes the six minimum control measures, evaluation/assessment and reporting efforts, and record-keeping. The SWMP is intended to:

- Reduce the discharge of pollutants to the “maximum extent practicable”;
- Protect water quality; and
- Satisfy the appropriate water quality requirements of the Clean Water Act.

The State General Permit defines a storm water management program for a small MS4, such as the City, as a program composed of six elements that, when implemented together, are expected to reduce pollutants discharged into receiving water-bodies to the maximum extent practicable (MEP). These six program elements, or minimum control measures (MCM), include:

- Public Education and Outreach on Storm Water Impacts
- Public Involvement/Participation
- Illicit Discharge Detection and Elimination

- Construction Site Runoff Control
- Post-Construction Storm Water Management in New Development and Redevelopment
- Pollution Prevention/Good Housekeeping for Municipal Operations

Public Review Process for the SWMP

Public review process for the City's SWMP included the following actions:

1. Release of the draft SWMP for public review on February 28, 2003
2. Public meeting of the Creeks Restoration and Water Quality Improvement Citizens Advisory Committee on March 12, 2003 to review draft and solicit public comments
3. Release of final draft SWMP on June 11, 2003
4. Public meeting of the Creeks Restoration and Water Quality Improvement Citizens Advisory Committee on June 18, 2003 to review and recommend final SWMP
5. Santa Barbara City Council meeting on July 22, 2003 for Council consideration and approval prior to submittal to the RWQCB.

Regional Permit

To enhance local coordination, and minimize administration, the City intends to cooperate with the County of Santa Barbara, and the cities of Goleta and Carpinteria to implement a co-permittee application for the State General Permit. A Memorandum of Agreement Providing for Administration of the Santa Barbara Regional Storm Water Management Program (MOA) establishes the agreement for the co-permittee application.

Notice of Intent

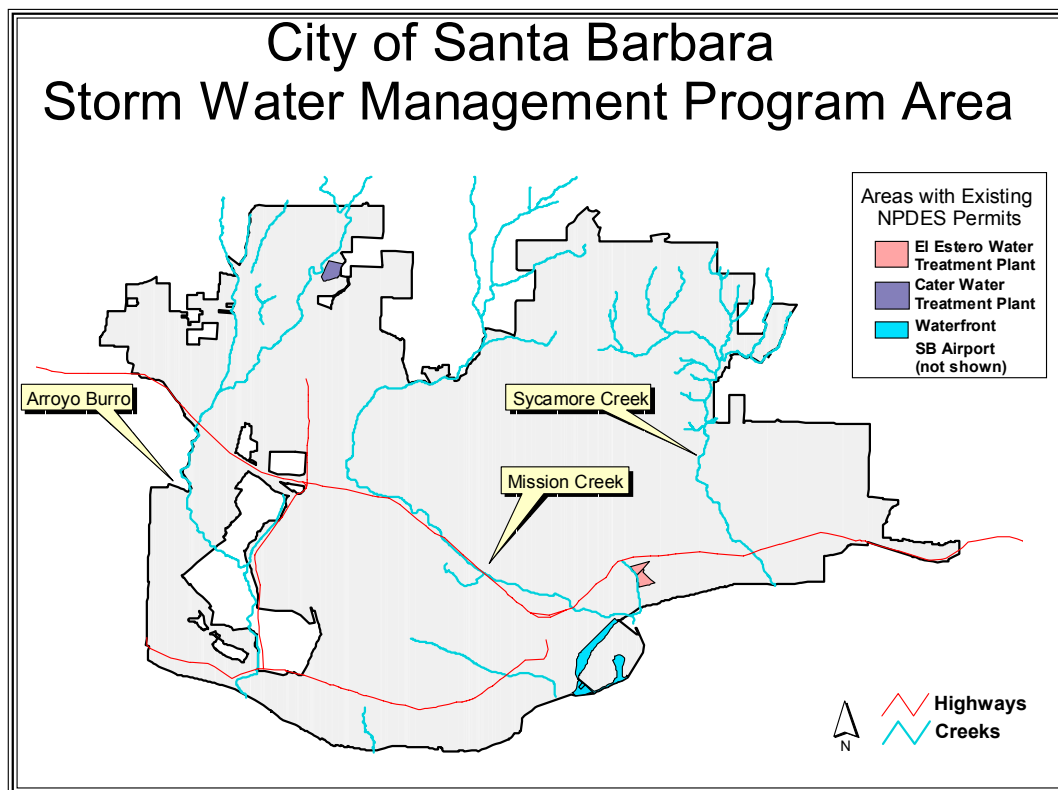
The City will file with the co-permittees a Notice Of Intent (NOI) to apply for coverage under the State General Permit. As required, the NOI and this SWMP contain the following information:

- The area covered by the SWMP
- Best management practices (BMPs) for each of the six minimum control measures
- Measurable goals for each of the BMPs including the years for scheduled actions and the frequency of the action
- Persons who will implement or coordinate the SWMP, as well as each MCM.

Contact Information

Although implementation of the SWMP is a citywide effort, the Public Works Department is responsible for coordinating the administration of the SWMP. The appropriate City department or division that will be implementing the SWMP is included in the discussion of each Minimum Control Measure. For more information on the City's SWMP, contact:

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II. INTRODUCTION

This Storm Water Management Program (SWMP) outlines the six minimum control measures the proposed by the City of Santa Barbara to comply with the State Water Resources Control Board Water Quality Order 2003-0005-DWQ for National Pollutant Discharge Elimination System (NPDES) Phase II General Permit No. CAS000004 (State General Permit). It addresses the permit period of August 2003 through August 2008.

Geographic Context

City of Santa Barbara encompasses 18.6 square miles. The City has three major creeks, Arroyo Burro, Mission and Sycamore, originating in the foothills north of the City, which flow south to the Pacific Ocean. The watersheds of each creek that are within the City are largely urbanized with residential, commercial and limited industrial development, an extensive road network, and parks and open space. Since the City is largely built out, there are few vacant parcels in general and few parcels in excess of 1 acre in size. Most future development will involve the redevelopment of already developed parcels.

Background

The City of Santa Barbara began to address storm water quality issues in 1998 due to increasing community concern over poor water quality in the ocean at community beaches. As part of this effort, the City collaborated and partnered with the County of Santa Barbara, community organizations and interested residents through Project Clean Water to implement education, water quality monitoring and water quality improvement projects to reduce the impacts of storm water pollution.

In November 2000 the City established a formal program, the Creeks Restoration and Water Quality Improvement Program (Creeks Program), to address both storm water and urban runoff issues and the need to restore natural creek areas. The City's proposed SWMP includes many of the elements of the Creeks Program, because they are also NPDES Best Management Practices. The proposed SWMP also draws from a number of other City programs responsible for land development, community safety, and infrastructure maintenance. Overall there are four primary City Departments involved in activities related to storm water management including Public Works, Fire, Community Development and Parks and Recreation. The Public Works Department will coordinate the City's proposed SWMP.

III. MINIMUM CONTROL MEASURES

The implementation and evaluation of the six minimum control measures (MCM) comprise the heart of the City's Storm Water Management Program. Within each MCM category, specific BMPs were selected based on a number of factors including current City practices, input from Santa Barbara community stakeholders, storm water quality assessments completed from 1998 through 2002, the results of physical observations of local creeks, and best available technology for storm water treatment.

1. PUBLIC EDUCATION AND OUTREACH ON STORM WATER IMPACTS

1.1 Requirements

The State General Permit requires that permittees, *implement a public education program to distribute materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.*

The following discussion outlines how the City of Santa Barbara meets the permit requirements through implementation of existing public education efforts as well as planned implementation of new public education programs throughout the five-year permit period.

1.2 Public Education and Outreach Best Management Practices

The City will continue its public education programs throughout the five-year permit period. Selection of these programs is based on the City's experience to date as well as extensive research and planning for the development of new programs that strategically targets members of the Santa Barbara community. In April 2002, the City and County of Santa Barbara sponsored a public opinion survey to determine the level of community awareness on storm water issues. The survey provided important information for future public education and outreach program development and specific target audiences. The findings of the survey as well as extensive stakeholder interviews resulted in the development of a comprehensive education plan. The education plan identified a number of programs that could play an important role in education the public about storm water impacts and pollution reduction strategies. The City will implement the following Public Education and Outreach BMPs:

- **Brochures:** Informational brochures on storm water quality targeting dog and horse owners, creekside residents, and gardeners plus a general storm water brochure called "The Ocean Starts at Your Door". These materials were all produced in both Spanish and English. These brochures were distributed at special events, by mail, through enforcement activities, and by request.
- **Event participation:** City staff will participate in relevant community events that provide public education opportunities on storm water impacts. These events could

include Earth Day, Creek Week, Sustainable Landscape Fair, and others. Ongoing Years 1-5.

- **Educational programs for school children:** In partnership with the County of Santa Barbara and the Community Environmental Council, the City developed a watershed curriculum called "Mountains to the Sea". Curriculum training for teachers is offered annually, and the curriculum is also distributed to teachers who request classroom presentations. City and County staff offer teacher training for the Project WET curriculum, which features water quality activities. Through this program, the City conducts classroom presentations for grades K – 6, and distributes materials such as a coloring book on nonpoint source pollution, stickers, and storm drain marker decals. Ongoing Years 1-5.
- **Educational programs for summer camps:** The City conducts storm water educational programs at summer camps throughout the City. Ongoing Years 1-5.
- **Storm Drain Marking:** The City has marked all 2,300 storm drain catch basins and drop inlets with bilingual plastic markers that state "No Dumping – Drains to Ocean, No Tire Desecho-Corre al Mar." The City will maintain and replace markers as necessary in Years 1-5.
- **Storm water hotline:** The PCW hotline is accessible at 1-877-OUR-OCEAN. Callers can report water quality issues or get information such as where to dispose of hazardous waste. Callers can select to be connected with a staff person in the City or County of Santa Barbara during working hours. Ongoing Years 1-5.
- **Business Outreach:** Business Outreach efforts includes the production and distribution of brochures and posters in Spanish and English that target restaurants, automotive services, construction contractors, and mobile cleaners. Brochures are distributed during site visits by City staff and Santa Barbara County Environmental Health Services restaurant inspectors. Ongoing Years 1-5.
- **Enrichment-Based Education:** Educational programs for school children will be enhanced with opportunities to reach youth outside of the classroom in after-school, community-based and neighborhood-based educational programs. These programs will be developed in Years 1 and 2 and then evaluated for continuation in Years 3-5.
- **Neighborhood-Based Outreach Program.** In addition to youth education, the City will be developing neighborhood outreach programs with educational programming, creek clean-ups and creek restoration activities, that are targeted to families and adults. Outreach will be specific to the creeks and storm water pollution problems found in each neighborhood. This program will be developed in Years 1 and 2, evaluated for continuation through Year 5.
- **Web Site:** The City will maintain the web site, www.sbcreeks.com which provides information on clean water activities. Ongoing Years 1-5.
- **Community Media Campaigns:** Print, radio and television campaigns will be developed on an as needed basis through Years 1- 5 to support the public education programs discussed above.
- **Informational Materials:** The City will be developing new informational brochures to reach specific target audiences in the community including individuals, businesses, and others as needed for public education efforts. These materials will be linked

directly to neighborhood and business outreach programs. Materials will be developed in Years 1 and 2, evaluated and continued through Year 5.

1.3 Implementation of Public Education and Outreach

The Parks and Recreation and Public Works Departments will be responsible for implementation of the Public Education and Outreach Minimum Control Measures. The City will also collaborate with the County of Santa Barbara, the Cities of Goleta and Carpinteria and local community organizations.

1.4 Measurable Goals

There are a number of measurable goals designed to demonstrate the achievements of public education and outreach on storm water impacts. The City will be focusing on measurable achievements that demonstrate a change in behavior to reduce storm water pollution. The City has baseline information on public knowledge from a public opinion survey completed in 2002. In order to measure the effectiveness of education programs, a follow-up survey will be conducted in Year 3 or 4. The table below outlines some of the goals that the City will use to measure program effectiveness. These goals will be further developed with the design and implementation of the public education program.

- Goal 1. Implement education programs as discussed above in Year 1-2.
- Goal 2: Implement methods to measure progress specific to the implementation of education programs in Year 1-2 and then ongoing through Year 5.
- Goal 3: Conduct public opinion survey to measure change in behavior due to education and outreach programs in Years 3-4.
- Goal 4: Revise programs as necessary to improve education methods, increase participation and reduce storm water polluting behaviors. Years 3-5.

2. PUBLIC INVOLVEMENT/ PARTICIPATION

2.1 Requirements

The State General Permit requires that, *the permittee must at a minimum comply with State and local public notice requirements when implementing a public involvement/participation program.*

The following discussion outlines how the City of Santa Barbara meets the permit requirements for public involvement and participation.

2.2 Public Involvement/Participation Best Management Practices

There is an extensive public involvement and participation framework already established which meets the requirements of the State General Permit. This framework includes a City Council appointed Citizens Advisory Committee, County Project Clean Water Stakeholders Committee, regular community forums and public workshops, and regional coordination among local, regional and state agencies. The public education programs discussed in the previous section also outline a number of programs that foster public involvement in the City's storm water management program.

2.2.1 Creeks Advisory Committee

In November 2000, when the City's Creeks Program was formally established, the City Council also established a citizen advisory to advise staff and City Council on matters related to the Creeks Program. The Creeks Restoration and Water Quality Improvement Program Citizens Advisory Committee consists of thirteen members, of which nine are voting members with expertise in land use and environmental issues, community concerns, business interests, hotel/lodging industry and ocean user interests, and four non-voting liaisons from the City Council, Planning Commission, Park and Recreation Commission, and the County Project Clean Water Program.

The Creeks Advisory Committee meets on a monthly basis. The meetings and agendas are noticed public meetings in accordance with the Brown Act. These meetings are held in a public place and televised on the City's Public Television Station Channel 18. Meeting agendas are available at least 72 hours prior to the meeting but are commonly posted on the City's web site and distributed via mail and email to interested parties six days prior to the meeting.

In addition to the Creeks Advisory Committee, proposed projects and programs related to storm water management are subject to the review and approval of the City Council in open, public meetings at which public participation is invited.

2.2.2 Project Clean Water Stakeholders Committee

In order to incorporate community concerns and ideas into regional clean water objective and projects, the Project Clean Water Stakeholders Committee was formed in 1998. The Stakeholders Committee consists of representatives of community organizations, local government agencies such as the Cities of Santa Barbara, Goleta and Carpinteria, staff from Santa Barbara City College and UCSB, and other interested individuals. All interested individuals or organization representatives are encouraged to attend monthly meetings. Meetings feature updates on County and City storm water programs, provide guest speakers on topics related to storm water pollution, and provide an opportunity for community members to discuss any issues of concern. Attendance varies from approximately 10 to 50 people. Santa Barbara County PCW staff maintains a Stakeholder email and mailing list, and those on the list are noticed of regular meetings, announcements, and other events through the email system and by monthly reports.

2.2.3 Community meetings/forums

In addition to the above-mentioned committee meetings, community meetings and forums are held periodically to discuss the direction and seek community input on the City's clean water and creek restoration programs. Neighborhood meetings and workshops are also held on an as needed basis to review and seek community input on a wide range of creek restoration and storm drain improvement projects as well as land development policy issues such as ordinance amendments.

2.2.4 Regional Agency Coordination

Since 1998, the City has participated in Santa Barbara County Intergovernmental Committee made up of local, state and federal agencies with interests in local storm-water issues. The Committee meets quarterly with both regulators (such as RWQCB) and regulated entities. Topics for discussion are suggested by participants and include development and interpretation of non-point source regulations, opportunities for cooperative efforts, emerging technology, and sharing of water quality information. The City's participation in the regional permit with the County of Santa Barbara, and the cities of Carpinteria and Goleta also will foster regional coordination.

2.3 Implementation of Public Involvement/Participation

The Parks and Recreation and Public Works Departments will be responsible for implementation of the Public Involvement/Participation Minimum Control Measures.

2.4 Measurable Goals

Public involvement and participation has been essential to the development and ongoing activities of the storm water management program, insuring that the City's program reflects community concerns and priorities to improve creek and ocean water

quality. The measurable goals for public participation and involvement include the following scheduled actions.

- Goal 1: Creeks Advisory Committee. The City will conduct 12 regular monthly meetings annually of the Creeks Advisory Committee that will be publicly noticed in accordance with the Brown Act and publicly noticed workshops as needed. Through email and website postings the City will maintain and expand community participation in Advisory Committee meetings. Ongoing, Years 1-5.
- Goal 2: Project Clean Water Stakeholders Committee. The City will participate in monthly Project Clean Water Stakeholders Committee meetings to provide information and seek participation in City storm water management programs. Ongoing, Years 1-5.
- Goal 3: Community Meeting Forum. The City will conduct an annual community forum on water quality issues. The number of participants and issues addressed will be documented. The City will also conduct on an as needed basis, neighborhood meetings and workshops to foster public participation in the implementation of storm water pollution reduction projects and programs. Ongoing, Years 1-5.
- Goal 4: Regional Coordination. City will continue to participate in the quarterly meetings of the Intergovernmental Committee. Ongoing, Years 1-5.

3. ILLICIT DISCHARGE DETECTION AND ELIMINATION

3.1 Requirements

The State General permit requires that the Permittee:

1. *Develop, implement and enforce a program to detect and eliminate illicit discharges (as defined at 40 CFR 122.26(b)(2)) into the regulated Small MS4:*
2. *Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and locations of all waters of the U.S, that receive discharges from those outfalls;*
3. *To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the MS4 and implement appropriate enforcement procedures and actions;*
4. *Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit;*
5. *Inform public employees, businesses, and the general public of the hazards that are generally associated with illegal discharges and improper disposal of waste; and*
6. *Address the following categories of non-storm water discharges or flows (i.e., authorized non-storm water discharges) only if the permittee identifies them as significant contributors of pollutants to the Small MS4:*

<i>Water line flushing</i>	<i>Irrigation water</i>
<i>Landscape irrigation</i>	<i>Springs</i>
<i>Diverted stream flows</i>	<i>Water from crawl space pumps</i>
<i>Rising ground waters</i>	<i>Footing drains</i>
<i>Potable water discharges</i>	<i>Lawn watering</i>
<i>Foundation drains</i>	<i>Individual residential car washing</i>
<i>Uncontaminated pumped ground water</i>	<i>Uncontaminated groundwater infiltration to separate storm sewers</i>
<i>Flows from riparian habitats and wetlands</i>	<i>Dechlorinated swimming pool discharges</i>
<i>Air conditioning condensation</i>	

Discharges or flows from fire fighting activities are excluded from the effective prohibition against non-storm water and need only be addressed where they are identified as significant sources of pollutants of waters of the U.S.

3.2 Illicit Discharge Detection and Elimination Best Management Practices

The following discussion outlines how the City proposes to meet the general permit requirements for illicit discharge detection and elimination best management practices. For the most part the City meets the requirements but proposes one new action for implementation during the first year permit period, which includes the review and revision, if necessary, of existing City ordinances to improve the regulation of illicit discharges to the storm drain system. Please see the discussion under Section 3.2.3.

3.2.1 Identification and Elimination of Illicit Discharge Sources

The City's existing program for identification and elimination of illicit discharge sources is comprised of three parts:

- Spill and Complaint Response
- Field Investigation and Abatement
- Municipal Code Enforcement

The primary City Departments involved in the identification and elimination of illicit discharge sources includes Public Works, Parks and Recreation, Community Development and Fire. (See Section 3.2.4.)

The following procedures are used to address the ongoing identification and abatement of illicit discharges:

Spill and Complaint Response

- Receive complaint or notice of the spill, discharge or illegal connection. Calls may come in direct, from other City sources, and from other agencies (primarily the County of Santa Barbara). Calls that fall within the illicit discharge category are normally directed to the Water Resources Specialist. Complaints may also be received from the Project Clean Water Hotline, 1-877-OUR-OCEAN.
- Identify the potential source of the discharge
- Document response and track the spill/discharge to source
- Use education and enforcement to eliminate the discharge to the storm drain/sewer or ground surface
- Apply BMPs if applicable to assure on-going compliance
- Maintain records of response to establish database, and to identify re-occurrence patterns. Enforcement cases are entered into the City's Permit Plan database.

Field Investigation and Abatement

- Identify and prioritize areas of potential illicit discharge and/or illegal connections for residential, commercial and industrial locations based on specified criteria
- Conduct periodic creek walks to identify potential sources
- Conduct field/inlet/outfall /site inspections
- Verify illicit discharge/illegal connection and identify the source
- Use education and/or enforcement to eliminate the discharge to the storm drain/sewer or ground surface
- Apply BMPs if applicable to assure on-going compliance
- Initiate enforcement case when necessary to achieve compliance with City Ordinance
- Maintain records of response to establish data base and to identify reoccurrence patterns

3.2.2 Storm Drain System Map

In order to ascertain the extent of the area covered by storm water collection drains, the City storm sewer system has been comprehensively mapped and surveyed, including all drainage pipes, inlets, outfalls and other drainage structures. This information is available in the offices of the City Public Works Department, Water Resources Division (phone 805.564.5460). The map is also available online to City staff in the City's GIS Data Browser, and is used extensively for pollution source tracking.

3.2.3 City Storm Water Ordinance

Ordinance Authority

The Santa Barbara Municipal Code (SBMC) provides enforcement authority for illicit discharges. Authority for detection and elimination of illicit dischargers and illegal connections are referenced or described in:

- SBMC Title 1 Administrative Code Enforcement Procedures
- SBMC Title 14 Water and Sewers, Natural Watercourses and Storm Drain System
- SBMC Title 16 Liquid and Industrial Waste Disposal

SBMC Title 1 Administrative Code Enforcement Procedures necessitates issuing a warning before any fines can be levied. Fines range from \$100 for the first violation to \$250.00 for the third violation occurring within a twelve-month period. The fine is a lien against the real property.

SBMC Title 14 Water and Sewers, Natural Watercourses and Storm Drain System regulates work and other activities within the creek channel. This title prohibits dumping in creeks/channels, or allowing any obstruction to a creek or channel or dumping in a

creek/channel, and prohibits any unpermitted grading, fill or stream bed alteration without a permit

SBMC Title 16 Liquid and Industrial Waste Disposal was adopted to protect the waters of the State; provide against pollution of streams, creeks and storm drains; control and regulate discharges to storm drains; and to control and regulate all discharges of waste or wastewater directly or indirectly into the sewage system and treatment and disposal works of the City of Santa Barbara.

New Action proposed as part of this SWMP

As part of the proposed Storm Water Management Plan (SWMP), SBMC Title 1 and Title 16 will be reviewed for consistency in achieving storm water pollution reduction enforcement goals. This review will be initiated in Year 1 with proposed revisions and any necessary ordinance amendments developed in Year 2.

Ordinance Enforcement

Enforcement of existing policies and ordinances is crucial to the effort of maintaining water quality in the creeks and oceans. Primary enforcement duties are provided by a fulltime Enforcement Officer. The Enforcement Officer responds to calls received, and/or coordinates between various enforcement agencies and personnel, and ensures increased report follow-up.

SMC Section 16.15 lists criteria for prohibited discharges and discharges exempt from prohibition. Enforcement of this code section is normally accomplished following the Administrative Guidelines of the administrative fines process, (SBMC Section 1.25). The initial approach to prevention and elimination is education on what the pollution source is, what effects it has on the watershed and how the problem may be eliminated through best management practices. But when necessary, education can be used in combination with legal enforcement in order to achieve elimination of the illicit discharge.

When illicit discharges (see table below) occur, they are corrected by explaining the Municipal Code violations and the relevance of creek contamination issues. Often, pointing out the error and suggesting best management practices to be used in the future is enough to convince businesses and homeowners to cease discharging, dumping or to eliminate the illegal connection. Formal enforcement cases are initiated against dischargers when the discharge violation is regarded as a moderate to significant threat, where the discharger is unresponsive or where there is a history of discharge violations. Every formal enforcement case is entered in the City Permit Plan database, which provides the record keeping necessary to track enforcement activities as required by the City Administrative Guidelines.

Potential Illicit Discharge Sources

Accidents	Illicit Connections
Spills of Vehicle Fluids (antifreeze, gas, oil, grease, hydraulic fluids, lubricants)	Residential
	Commercial
	Industrial
Glass	Illegal Dumping
Asbestos Brake Fibers	Solids
Auto Dealers	Liquids
Auto Shops	Industrial Cooling Water
Auto - Residential Cleaning	Oil Drips/Fuel Leaks (new/used)
Businesses Washdown	Commercial
Commercial Irrigation	Residential
Construction	Apartments
Sediment	Paint
Asphalt Cuttings	Parking Lots
Carpet/Residential Cleaning	Pools and Spas
Cement Washing	Residential
Equipment Cleaning	Grey Water
Food Facility Cleaning	Hazardous Materials
Facility Cleaning - gray water	Pesticides
Cooking Equipment - grease, oil and hazardous cleaning agents	Fertilizers
	Sediments
Grease Trap	RV Waste
Dumpsters	Sewage Spills
Gas Stations/Vehicle Service Stations	Septic Spills
Car Wash	Sumps/Dewatering

3.2.4 Non-Storm Water Discharges

Similar to illicit discharges, certain non-storm water discharges are prohibited in SBMC Title 16 and SBMC Title 14. The City detects and addresses non-storm water discharges through a number of programs similarly used for illicit discharges, including:

- Creeks Program:** Staff is responsible for complaint response and initiation of enforcement cases in most non-storm water discharge violations occurring in the City, and for all proactive enforcement. Staff responds to complaints regarding water quality throughout the year. Response occurs within twenty-four hours of notification, resulting in compliance with the performance measures regarding service response. Complaints range from illegal dumping of trash and green-waste in the creeks, to the illegal disposal of liquid waste. Complaint response may require the cooperation of many agencies. Callers are not always aware of the unincorporated area boundaries, so a call referral system has been established so that calls can be efficiently redirected to the correct agency.

- **Santa Barbara County Environmental Health Services (EHS):** Another program that abates illicit discharge violations is the EHS Community Health Program. District Specialists perform routine annual inspections and complaint investigations at all retail food facilities in the City. EHS has expanded their normal inspection techniques to include storm water management activities. Due to increased public awareness, EHS has received a greater number of complaints associated with unlawful discharges from permitted food facilities. Illegal activities include floor mat and floor wash-down discharge to storm drains. EHS responds to each complaint and takes appropriate enforcement action.

In an effort to prevent illicit discharges from faulty septic systems, in April 1999, EHS revised Chapter 29 of the Santa Barbara County Code to include mandatory reporting of septic system servicing and inspection. This ongoing reporting system of voluntary septic system servicing reveals operational problems in existing septic systems. These systems are required to make repairs or modifications to meet minimum operational sanitary standards. Local service providers have been reporting all inspections of septic systems in the City to EHS. The City receives copies of these septic service inspection reports from EHS. The Community Development Department, Building Division, reviews the reports and follows up where corrections to the septic system may be required.

- **City Public Works Department, Water Resources Division:** This division investigates and abates violations of sewage waste discharge. Illegal and/or illicit discharges of sewage onto the ground surface and/or into the storm drain collection system may be the result of discharges from faulty sewer laterals, sewer mains or failing septic systems. Correction notices are issued to owners of deficient septic systems, requiring them to make repairs or upgrades as necessary to meet current septic system sanitary standards. Spills are reported to EHS to ensure remediation.

Concurrent with the EHS efforts described above, the City provides as an incentive a 50% waiver of the sewer connection fee to parcel owners using septic systems, if they will properly abandon their systems and connect to sanitary sewer. Additionally, the City requires that parcels within 200 feet of an existing sewer shall connect to sewer. The City works with parcel owners with septic systems on annexation and other issues involved with connecting to the sewer system.

City staff conduct an ongoing smoke detection program to locate breaks in sewer mains and laterals, illegal connections to sanitary sewer and cross-connections from sanitary sewer to storm sewer. Any break located on a sewer main is immediately scheduled for repair. When a break or cross-connection is found on a private lateral, a correction notice is issued, and repairs must be completed within thirty days. Smoke testing is normally scheduled monthly, using a crew of five. Also all creek crossings are inspected two times a year and after each major storm event. These inspections may be visual, or may be done by dye testing.

- **County Fire Department – Protection Services:** Labeling and storage of hazardous material is within the jurisdiction of the County Fire Department. For new businesses that use or store hazardous materials, conditions of approval are included in the standard conditions and mitigation measures enforced by this department. These require a safe, storage area for pesticides, herbicides, and fertilizers to contain spills. In addition, a Hazardous Materials Business Plan must be submitted to the County Fire Department in order to detect potential hazardous associated with the chemicals. The County Fire Department is responsible for inspecting sites and monitoring their compliance with hazardous materials best management practices and spill response.
- **City Fire Department –Response:** City Fire Department First Responders and the Hazardous Materials Response Team, depending on the hazard level and severity of the spill, may make a spill response. Emphasis is made on containment and cleanup with public health and safety as the foremost consideration in an environmentally sensitive manner.

3.2.5 Public Information

Educating public employees, business owners, industries, and the general public on the hazards associated with illegal discharges and improper disposal of waste is being accomplished in a number of ways. BMP brochures have been created for targeted business sectors, such as automotive service and repair, parking lots, restaurants and construction. The brochures are distributed by mail and direct contact. Additional information related to Public Information can be found in the discussion of Public Education and Outreach Minimum Control Measures.

The City Enforcement Officer monitors businesses and undertakes proactive enforcement by contacting targeted businesses in person and by mail with appropriate BMP information and technical assistance. These contacts may include inspection of facilities for illicit connections and/or staff BMP training.

3.2.6 Non-Storm Water Discharges or Flows

Non-storm water discharges or flows (i.e. authorized non-storm water discharges) that are identified as significant contributors of pollutants will be addressed with BMPs developed through the City's Enforcement Program.

The following are discharges that are currently addressed:

- SBMC Title 16.15 prohibits swimming pool and spa discharges unless permitted by the Public Works Director.
- Irrigation runoff that is excessive is prohibited by SBMC Title 14.20 Water Regulations.

- BMPs are used now to address a number of non-storm water discharges involving municipal operations, and new BMPs will be developed for municipal operations as described in section 6 of this permit.

3.3 Implementation of Illicit Discharge Detection and Elimination Minimum Control Measures

As discussed in Section 3.2, implementation of the proposed illicit discharge detection and elimination minimum control measures is primarily the responsibility of the Public Works Department, Fire Department and City Creeks Program.

3.4 Measurable Goals

The following measurable goals for best management practices have been selected to ensure that illicit discharges are detected, eliminated and prevented throughout the five-year permit period. The City maintains extensive records on enforcement activities and resolution to illicit discharges. These records are reviewed to determine trends, develop improved public information, and ensure cooperation and collaboration among City departments and other agencies.

- Goal 1: Complete review and revision, if necessary, of ordinances that regulate illicit discharges, to improve enforcement and compliance by Year 2.
- Goal 2: Respond to complaints of illicit/illegal discharge within 24 hours of receiving the complaint, referral or notice. Ongoing, Years 1-5.
- Goal 3: Document number of illicit discharge complaint responses and enforcement actions. Ongoing, Years 1-5.
- Goal 4: Document number of proactive enforcement contacts. Ongoing, Years 1-5.
- Goal 5: Reduce illicit discharge complaints over time due to increased enforcement and education. Ongoing, Years 1-5.
- Goal 6: Document response to inspection reports from septic system pumpers, identify deficiencies in order to ensure that the deficiencies are repaired or eliminated. Ongoing, Years 1-5.

4. CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

4.1 Requirements

The State General Permit requires that the Permittee, *“develop, implement and enforce a program to reduce pollutants in any storm water runoff to your Small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The program must include the development and implementation of, at a minimum:*

- 1. An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions, or other effective mechanisms, to ensure compliance, to the extent allowable under State, or local law;*
- 2. Requirements for construction site operators to implement appropriate erosion and sediment control best management practices;*
- 3. Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;*
- 4. Procedures for site plan review which incorporate consideration of potential water quality impacts;*
- 5. Procedures for receipt and consideration of information submitted by the public; and*
- 6. Procedures for site inspection and enforcement of control measures.”*

4.2 Construction Site Storm Water Runoff Control Best Management Practices

The following discussion outlines how the City proposes to meet the general permit requirements for construction site storm water runoff control best management practices. For the most part the City meets the requirements but proposes one new action for implementation, which includes the development and adoption of specific municipal code provisions that establish clear requirements for standard erosion control measures and detailed erosion control plans for new development or redevelopment projects that are subject to such requirements. Please see discussion under Section 4.2.1.

4.2.1 Regulatory Mechanism for Erosion and Sediment Control

As a matter of practice, the City requires erosion controls on all projects where there is removal of vegetation, grading or other soil disturbance. On small projects the erosion control requirements may be minimal, consisting of a handout containing BMP details and notice that erosion controls must be used. Detailed erosion control plans are required on larger projects with slope, adjacency to creek and project size among the considerations in the determination whether detailed erosion control plans or standard

erosion controls are required. The detailed erosion control plan must include a Plan View drawing of the erosion control placement, and include BMP installation details. Erosion controls are required throughout the year during construction. These requirements are an established practice in the development, review, and approval process but the City does not have a comprehensive adopted policy or regulation that requires erosion and sediment controls. The City uses the Uniform Plumbing Code (Chapter 11, Storm Drainage) and Uniform Building Code (appendix Chapter 33) to enforce erosion control requirements. City erosion control requirements are also authorized in City Title 22, Vegetation Removal, which contains erosion control, slope stabilization and grading requirements, and applies to the Hillside Design District.

New Action

Currently, the City is evaluating its requirements and regulatory authority in the application of erosion control standards on land development projects. The City policies and regulations that establish erosion control standards will be reviewed and revised or replaced, as necessary, with new standards, which are likely to be needed to comply with the State General Permit.

The City recently completed a study to identify the range of erosion control measures including the types of BMPs, methods for application, design and installation (relative to project site size, location, and other considerations), and inspection and approval requirements. Staff review, public input, and review and approval by the Planning Commission and City Council are needed prior to the completion of new standards and requirements. The new conditions would equal or exceed the minimum permit requirement (sites of one acre or greater of land disturbance). It is anticipated that the development and adoption of new erosion control measures could be completed by Year 1.

4.2.2 Requirements for Construction Site Operators

Sediment control BMPs and other good housekeeping practices are required of construction site operators on all permitted projects in the City. The City's *Procedures for the Control of Runoff into Storm Drains and Watercourses* was developed by the Public Works Department as a specification section containing BMP requirements for general construction work. The *Procedures* outline a selection of required sediment control BMPs, such as drain inlet protection and stabilized construction entrance/exit. Implementation of BMPs listed in the *Procedures* is required on all issued Public Works permits, and a copy is included with every permit. Use of the *Procedures* is also required on all discretionary review projects. This requirement is made clear to all permit applicants as a standard condition of project approval. These standards may be enforced on all projects with discharge to City drainage.

The City and the County of Santa Barbara developed a brochure, *A Guide for Construction Contractors*, available in English and Spanish, which is included with all permits (with a few categorical exceptions, such as the re-roofing of an existing

structure) issued at the building counter. The *Guide* was designed to be a user friendly source of construction site management BMPs similar to those included in the *Procedures*. The procedures and guide are included in Attachment B to this SWMP.

4.2.3 Procedures for Site Plan Review

Currently, the City evaluates the need for sediment and erosion control measures for all projects permitted in the City. All projects requiring permits from the City are subject to either administrative or discretionary review by the Community Development and Public Works Departments. The Building Division of the Community Development Department utilizes the plan check process to assess the need for erosion controls on a given project. This approach assures that all permitted projects in the City are reviewed for erosion controls, since all projects are routed through plan check. As discussed in 4.2.1, procedures for site plan review will be revised in conjunction with any proposal for new or revised erosion and sediment control standards.

4.2.4 Procedures for Receipt and Consideration of Information Submitted by the Public

The discretionary review process for land development projects provides for public hearing process that includes public comment. Planning Commission, Architectural Board of Review and/or City Council may review discretionary review projects, in addition to the many other City commissions and committees, such as Historic Landmarks Commission, Harbor Commission and Parks and Recreation Commission, depending on project location and the nature of the proposed development.

4.2.5 Inspection and Enforcement of Erosion Control BMPs

City Building Inspection staff inspects erosion controls on private property, and City Public Works Inspection staff inspects erosion and sediment controls on publicly owned property. Erosion controls are normally inspected in the course of other scheduled inspections, in particular grading, foundation and rebar inspections, and in response to complaints. City Building Inspection staff annually includes winterization of construction sites in fall inspections.

4.3 Implementation of Construction Site Storm Water Runoff Control Minimum Control Measures

As discussed in Section 4.2, monitoring of the Construction Site Storm Water Runoff Minimum Control Measures will be undertaken by the Public Works Department and Community Development Department.

4.4 Measurable Goals

The following goals will be used to check progress each year as well as demonstrate the efforts made to reduce pollutants to the maximum extent practicable. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

- Goal 1: Amend erosion control ordinance clarifying erosion and sediment control requirements by Year 1.
- Goal 2: Establish mechanism to track BMP inspections, violations, and resolution to violation in Permit Plan by Year 1.
- Goal 3: Document number of violations issued by City Inspectors for construction projects related to water quality. Ongoing, Years 1-5.
- Goal 4: Document increased compliance with erosion and sediment controls. Years 1-5.

5. POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

5.1 Requirements

The State General Permit requires that the Permittee:

- 1. Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the Small MS4 by ensuring that controls are in place that would prevent or minimize water quality impacts;*
- 2. Develop and implement strategies, which include a combination of structural and/or non-structural BMPs appropriate for your community;*
- 3. Use an ordinance other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law. For those Small MS4s described in Supplemental Provision E below, the requirements must include the design standards contained in Attachment 4 of this General Permit; and*
- 4. Ensure adequate long-term operation and maintenance of BMPs.*

5.2 Post Construction Storm Water Management Best Management Practices

The following discussion outlines how the City proposes to meet the general permit requirements for post construction storm water best management practices. For the most part the City meets the requirements but proposes one new action for implementation, which includes the development and adoption of specific design standards for post construction runoff. Please see the discussion under Section 5.2.3.

5.2.1 Post Construction Storm Water Runoff Program

The City's discretionary permit review process provides the opportunity to require new development and redevelopment projects to include post construction storm water BMPs where appropriate. The typical conditions that trigger post construction BMP requirements are: project size; 10 or more parking spaces; adjacency to creek, ocean or other drainage channel; commercial or industrial use. The BMP design must take into account the anticipated pollutant load, site features and constraints, and must be sized appropriately.

5.2.2 BMP Strategies

Storm water detention or retention requirements are imposed on projects in areas with known drainage issues. The applicant is usually given the option of upgrading the drainage system to accommodate the increased discharge, or to retain the post-

development runoff onsite. As a result of this review process, completed projects now contain features that control for polluted runoff into the watershed, such as vegetated buffers, permeable surface, bio swales, infiltration trenches and pollution interceptors.

5.2.3 Design Standards

New Action

To comply with the State General Permit, the City will develop Post-Construction BMP design standards and guidelines to provide water quality protection on new development, and design guidelines for storm water treatment facilities and retention facility requirements, per Attachment 4 of the General Permit. The proposed design criteria and supporting code language will be reviewed for consistency with Attachment 4 of the General Permit.

The development and adoption of new design standards will be completed by Year 2.

5.2.4 Ensure Adequate Long-term Operation and Maintenance of BMPS.

All discretionary projects with post-construction stormwater BMPs are required to have a BMP maintenance plan. The owner(s) are required to have a maintenance schedule and appropriate BMP maintenance manuals, and to retain all BMP maintenance records for two years. Inspection of the BMPs and maintenance records will be required annually. The City tracks BMPs in the Permit Plan database, and uses the database to generate mailings requesting BMP maintenance records. Provision for long-term maintenance of BMPs is required of all discretionary review projects. On applicable projects, a maintenance provision is required in the covenants, conditions and restrictions (CC&Rs) that are the governing documents that dictate how the homeowners association operates and what rules they must obey.

5.3 Implementation of Post-Construction Storm Water Management Minimum Control Measures

The Public Works Department and Community Development Department will be responsible for implementation of the post-construction Storm Water Management Minimum Control Measures.

5.4 Measurable Goals

The following goals will be used to check progress each year as well as demonstrate the efforts made to reduce pollutants to the maximum extent practicable. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

Goal 1: Complete new design standards ordinance by Year 2.

- Goal 2: Evaluate all discretionary projects for construction and implementation of water quality control measures. Ongoing, Years 1-5.
- Goal 3: Document the number of annual inspections of BMPs and audit of maintenance records. Ongoing, Years 1-5.
- Goal 4: Document the number of enforcement actions taken on conditioned projects, such as correction notices, stop work order, and collection of any bonds, and time frame for developer to take corrective steps to resume work. Ongoing, Years 1-5.

6. POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

6.1 Requirements

The State General Permit requires that the Permittee:

- 1. Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and*
- 2. Using training materials that are available from EPA, the State, or other organizations, your program must include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet building maintenance, new construction and land disturbances, and storm water system maintenance.*

6.2 Pollution Prevention/Good Housekeeping Best Management Practices

The following discussion outlines how the City proposes to meet the general permit requirements for pollution prevention/good housekeeping best management practices. The City proposes to develop an operation and maintenance program for all eight City operations divisions, and extensive staff training programs.

6.2.1 Develop Operation and Maintenance Program

The nine City Operations Divisions that have practices that may have a potential impact on water quality will develop pollution prevention plans for their respective operations and maintenance programs. These divisions include: Fire Department Operations/Training, Public Works Department Streets, Parking Operations, Water Resources, Building Maintenance, Motor Pool, Waterfront Department Stearns Wharf and Parks and Recreation Department Golf Course and Parks Maintenance. These Divisions are responsible for facilities such as the water distribution system, the wastewater collection system, maintenance of City facilities, parks maintenance operations and parking maintenance operations. Each plan will include, at a minimum, specific BMPs that are prioritized for implementation, an implementation schedule and measurable goals. Vendors and contractors who provide services for the City will also be required to comply with BMPs outlined in specific pollution prevention plans. Pollution Prevention plans will be developed in Year 1.

6.2.2 Training of City Operations Divisions

All City employees will receive training on storm water pollution prevention based on their work responsibilities. Much of the training programs will be integrated into existing training presented to staff, such as safety training. Training materials will be developed including video and informational handouts in Year 1.

Depending on personnel involved, storm water training will occur either bi-annually or annually. In addition, managers will be given specific guidance on their departmental and contractual responsibilities for storm water management. Frequency and type of training will depend on the activities targeted.

Staff involved in the review and inspection of construction projects will attend appropriate training sessions on construction site BMPs and erosion control measures, and will be trained on the application of any new erosion control requirements adopted by the City.

6.3 Implementation of Pollution Prevention/Good Housekeeping for Municipal Operations

The Public Works Department will be responsible for implementation of the Pollution Prevention/Good Housekeeping for Municipal Operations Minimum Control Measures.

6.4 Measurable Goals

The following goals will be used to check progress each year as well as demonstrate the efforts made to reduce pollutants to the maximum extent practicable. The intent is to provide an opportunity to assess and evaluate the program and provides a feedback mechanism to measure and update the program as appropriate.

- Goal 1: Develop and implement Pollution Prevention Plans for eight operations divisions in Year 1.
- Goal 2: Monitor measurable goals for each pollution prevention plan, including the number of BMPs to be implemented, schedules for their implementation, and evaluation of the appropriateness of selected BMPs. Ongoing, Years 1-5.
- Goal 3: Evaluate contractor compliance with BMPs for City contracts. Ongoing, Years 1-5.
- Goal 4: Develop and implement training program. Ongoing, Years 1-5.

IV. MONITORING PROGRESS AND REPORTING

Monitoring and Reporting Requirements

The purpose of monitoring and reporting is to document successful implementation of the SWMP. The General Permit requires annual reports be submitted starting in August 2004. The City intends these annual reports to cover the fiscal year immediately prior to the reporting period. As an example, the first year report will cover the period from SWMP approval through June 30, 2004. The table on the following page shows the schedule for implementation of BMPs as proposed in this SWMP.

The City will monitor the implementation of its program and the overall effectiveness by measuring and reporting the data discussed in the individual Minimum Control Measures sections discussed above.

Generally speaking, five types of data will be collected:

- Progress establishing BMPs that are developed during the SWMP implementation period, or establishing existing BMPs in newly identified permit areas
- Training the staff (and as appropriate contractors) who work for the City
- Objective measures of ongoing BMPs such as public participation or education outreach
- Response time and results of pollution cleanup
- Water quality monitoring: Test ocean and creek bacteria samples collected from up to 30 sites per week
- All goals identified in this SWMP

The City will regularly evaluate both current conditions and BMP effectiveness, and as appropriate update BMPs and measurable goals to achieve the objective of meeting water quality standards and reducing storm water pollution to the maximum extent practicable. If after implementing the minimum control measures there is still water quality impairment associated with discharges from the City's MS4, it may be necessary to expand or better tailor existing BMPs.



Schedule for Minimum Control Measure Goals

		Year 1	Year 2	Year 3	Year 4	Year 5
Public Education and Outreach on Storm Water Impacts						
Goal 1	Implement new education plan programs as discussed above.	✓	✓			
Goal 2	Implement methods to measure progress specific to the implementation of education program.	✓	✓	✓	✓	✓
Goal 3	Conduct public opinion survey to measure change in behavior due to education and outreach programs.			✓	✓	
Goal 4	Revise programs as necessary to improve education methods, increase participation and reduce storm water polluting behaviors.			✓	✓	✓
Public Involvement/Participation						
Goal 1	Conduct 12 regular monthly meetings annually of the Creeks Advisory Committee.	✓	✓	✓	✓	✓
Goal 2	Participate in monthly Project Clean Water Stakeholders Committee meetings.	✓	✓	✓	✓	✓
Goal 3	Conduct an annual community forum on water quality issues. Conduct on an as needed basis, neighborhood meetings and workshops to foster public participation.	✓	✓	✓	✓	✓
Goal 4	Regional Coordination. Participate in the quarterly meetings of the Intergovernmental Committee and CASQA.	✓	✓	✓	✓	✓
Illicit Discharge Detection and Elimination						
Goal 1	Complete review and revision, if necessary, of ordinances that regulate illicit discharges, to improve enforcement and compliance.	✓	✓			
Goal 2	Respond to complains of illicit/illegal discharge within 24 hours of receiving the complaint, referral or notice.	✓	✓	✓	✓	✓
Goal 3	Document number of illicit discharge complaint responses and enforcement actions.	✓	✓	✓	✓	✓
Goal 4	Document number of proactive enforcement contacts.	✓	✓	✓	✓	✓
Goal 5	Reduce illicit discharge complaints over time due to increased enforcement and education.	✓	✓	✓	✓	✓
Goal 6	Document response to inspection reports from septic system pumpers, identify deficiencies in order to ensure that the deficiencies are repaired or eliminated.	✓	✓	✓	✓	✓
Construction Site Storm Water Runoff Control						
Goal 1	Develop ordinance clarifying erosion and sediment control requirements.	✓				
Goal 2	Establish mechanism to track BMP inspections, violations, and resolution to violation in Permit Plan.	✓				
Goal 3	Document number of violations issued by City Inspectors for construction projects related to water quality.	✓	✓	✓	✓	✓
Goal 4	Document increased compliance with erosion and sediment controls.	✓	✓	✓	✓	✓
Post-construction Storm Water Management						
Goal 1	Complete new design standards ordinance.	✓	✓			
Goal 2	Evaluate all discretionary projects for construction and implementation of water quality control measures.	✓	✓	✓	✓	✓
Goal 3	Document the number of annual inspections of BMPs and audit of maintenance records.	✓	✓	✓	✓	✓
Goal 4	Document the number of enforcement actions taken on conditioned projects.	✓	✓	✓	✓	✓
Pollution Prevention/Good Housekeeping for Municipal Operations						
Goal 1	Develop and implement Pollution Prevention Plans for eight operations divisions.	✓				
Goal 2	Monitor measurable goals for each pollution prevention plan.	✓	✓	✓	✓	✓
Goal 3	Evaluate contractor compliance with BMPs for City contracts.	✓	✓	✓	✓	✓
Goal 4	Develop and implement training program.	✓	✓	✓	✓	✓